

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BOARD OF TRUSTEES OF THE AFTRA  
RETIREMENT FUND, in its capacity as a  
fiduciary of the AFTRA Retirement Fund,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-00686 (SAS) (DF)

BOARD OF TRUSTEES OF THE IMPERIAL  
COUNTY EMPLOYEES' RETIREMENT  
SYSTEM, in its capacity as a fiduciary of the  
Imperial County Employees' Retirement System,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-03020 (SAS) (DF)

THE INVESTMENT COMMITTEE OF THE  
MANHATTAN AND BRONX SURFACE  
TRANSIT OPERATING AUTHORITY  
PENSION PLAN, in its capacity as a fiduciary  
of the MaBSTOA Pension Plan, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

No. 09-cv-04408 (SAS) (DF)

**DECLARATION OF SAMUEL E. BONDEROFF**

SAMUEL E. BONDEROFF declares under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an associate with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys for defendant JPMorgan Chase Bank, N.A. in this action. I respectfully submit this declaration on behalf of defendant in support of its Memorandum of Law in support of its motion *in limine* to exclude certain expert testimony of Bernard Black, Fiachra O'Driscoll, and Daniel Nigro.

2. The purpose of this declaration is to submit and identify for the Court true and correct copies of the following testimony and documents referenced in defendant's moving papers.

3. Attached as Exhibit A is a true and correct copy of the Expert Report of Bernard S. Black dated August 13, 2010.

4. Attached as Exhibit B is a true and correct copy of excerpts of the deposition transcript of Bernard S. Black dated December 3, 2010.

5. Attached as Exhibit C is a true and correct copy of the Declaration of Daniel J. Nigro dated August 12, 2010.


6. Attached as Exhibit D is a true and correct copy of excerpts of the deposition transcript of Daniel J. Nigro dated November 18, 2010.

7. Attached as Exhibit E is a true and correct copy of the Report of Fiachra O'Driscoll dated August 13, 2010.

8. Attached as Exhibit F is a true and correct copy of excerpts of the deposition transcript of Fiachra O'Driscoll dated December 9, 2010.

9. Attached as Exhibit G is a true and correct copy of additional excerpts of the deposition transcript of Fiachra O'Driscoll dated December 9, 2010.

Dated: New York, New York  
September 12, 2011



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SAMUEL E. BONDEROFF